

## REMARKS

This Amendment is in response to the Office Action mailed May 27, 2003. In the Office Action, Claims 3-7, 10-15 and 18-24 were rejected under 35 U.S.C. §103(a).

Claims 3, 5, 10, 12, 15 and 21-22 were rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,002,411 (hereinafter referred to as "the '411 patent") in view of U.S. Patent No. 6,173,381 issued to Dye (hereinafter referred to as "the '381 patent"). Claims 4, 11, 18 and 23-24 were rejected under 35 U.S.C. §103(a) as being unpatentable over the '411 patent in view of the '381 patent and U.S. Patent No. 5,574,836 issued to Broemmelsick (hereinafter referred to as "the '836 patent"). Claims 6, 13 and 19 were rejected under 35 U.S.C. §103(a) as being unpatentable over the '411 patent in view of the '381 patent and U.S. Patent No. 5,733,246. Claims 7, 14, and 20 were rejected under 35 U.S.C. §103(a) as being unpatentable over the '411 patent in view of the '381 patent and U.S. Patent No. 5,748,178. Applicants respectfully traverse the multiple §103(a) rejections in their entirety.

### I. REJECTIONS UNDER 35 U.S.C. §103(a) - CLAIMS 3, 5, 10, 12, 15 AND 21-22

Claims 3, 5, 10, 12, 15 and 21-22 were rejected under 35 U.S.C. §103(a) as being unpatentable over the '411 patent in view of the '381 patent. Applicants respectfully disagree with the rejection because a *prima facie* case of obviousness has not been met. Neither the '411 patent nor the '381 patent, either alone or in combination, describes or even suggests a display controller, operation or sub-program that sends *only marked memory pages of the image frame to the display* as set forth in claims 3, 10 and 15. (Emphasis added.) A "marked memory page" corresponds to a region of an image frame that has been updated (modified).

In contrast, the '411 patent involves a technique to reduce the amount of data transferred between locations *in system memory*. (Emphasis added). By reducing the amount of data required to be moved, the CPU 102 is freed up and is allowed greater time to work on the application program. *See column 11, lines 56-58 of the '411 patent.* This technique, however,

does not describe or even suggest the *sending of only marked memory pages* of the image frame *from the display controller to the display* to refresh the display as claimed. (Emphasis added).

More specifically, the '411 patent describes a Window Assembler 240 that assembles video refresh data on a per window basis using a pointer-based Display Refresh List. *See column 17, lines 8-11 of the '411 patent.* The Display Refresh List is stored in system memory 110 and includes pointers which reference video data for display. *See column 17, lines 13-14 of the '411 patent.* When an object or window is moved to a new position on the video screen, the data comprising the object does not transfer to another location in system memory 110. Rather, only the display pointer address is changed in the Refresh List. This is, in essence, a bit block transfer (bit blit). *See column 17, lines 36-48 of the '411 patent.* No exclusive marked memory page transmissions to the display are made as set forth in the claims. In fact, even if the pointers of the Display Refresh List are construed by the Examiner as equivalent to the marked memory pages, these pointers are not send from the display controller to the display as claimed.

Hence, Applicants respectfully request withdrawal of the above-cited §103(a) rejection.

## II. REJECTIONS UNDER 35 U.S.C. §103(a) - CLAIMS 4, 6-7, 11, 13-14, 18-20 AND 23-24

Claims 4, 6-7, 11, 13-14, 18-20 and 23-24 have been rejected under 35 U.S.C. §103(a) as being unpatentable over the '411 patent in view of the '381 patent and another secondary reference, namely either Brommelsick, Forkey or Drewry. Applicants respectfully request that the above-identified claims are in condition for allowance not only by their dependency on allowable claims 3, 10 and 15 and that there is no motivation to combine the three references together.

CONCLUSION

In view of the amendments and remarks made above, it is respectfully submitted that all pending claims are in condition for allowance, and such action is respectfully solicited.

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN LLP

Dated: July 25, 2003

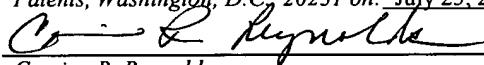


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7/25/03  
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